

GLENN A. GARBER, P.C.

ATTORNEYS AT LAW

GLENN A. GARBER
(ADMITTED IN NY & NJ)

THE WOOLWORTH BUILDING
233 BROADWAY, SUITE 2370, NEW YORK, NY 10279
TEL: 212-965-9370 FAX: 212-965-9375
WWW.GLENNGARBER.COM

October 6, 2025

By ECF

Hon. Cherly L. Pollack
U.S. District Court Magistrate Judge
Eastern District of New York
100 Centre Street
New York, NY 10013

Re: *Earl Walters v. City of New York, et. al.*, 24cv8111 (RER-CLP)

Dear Pollack:

I write on behalf of the parties to provide an update on discovery and on the pending Court of Claims case. We apologize for the delay. The update was due on Friday, October 3, 2025.

The City and Navarra's estate are still in the process of obtaining the District Attorney's file. Assistant corporation counsel Kelly Anne Holohan is no longer with Corporation Counsel. ACC Jack McLaughlin will be providing the Court with an update on his progress by separate letter.

As to the Court of Claims, we had our first Alternative Dispute Resolution conference with Judge Catherine Leahy-Scott on September 17, 2025. Our next session is scheduled for January 21, 2026. The delay was related to the assigned assistant attorney general's trial schedule. If ADR is unsuccessful the case is expected to proceed to trial on May 21, 2026, before Judge Ruth Shillingford.

The parties jointly request a 30-day extension, until November 3, 2025, to provide an update on discovery.

Respectfully submitted,


Glenn A. Garber

cc: All counsel (via ECF)